

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS LLC,

Defendants.

-----X

PLEASE TAKE NOTICE, that upon the attached Declaration of Daniella Levi, Esq., dated February 25, 2022, and upon the accompanying Memorandum of Law, Plaintiff IME WatchDog, Inc. will move this Court at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11021, at a date and time to be determined by the Court, for an Order permitting Plaintiff to file exhibits under seal and redact selected portions of other documents submitted to the Court in connection with Plaintiff's Order to show cause seeking injunctive and equitable relief against Defendants for violations of the Defend Trade Secrets Act.

Dated: Lake Success, New York
February 25, 2022

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

_____/s_____
Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
emanuel@mllaborlaw.com